

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

HELEN MEIMARIS AS EXECUTRIX and LEGAL  
REPRESENTATIVE OF THE ESTATE OF ALKIVIADES  
MEIMARIS AND HELEN MEIMARIS,

Plaintiffs,

-against-

JOSEPH E. ROYCE, LAWRENCE A. BLATTE,  
TULIO PRIETO , JAIME LEROUX,  
TBS Shipping Services Inc., Guardian Navigation ,  
Services Inc., Gruposedei and Tecnisea,  
Defendants.

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1:18-cv-4363 (GBD)(BCM)

**SUPPLEMENTAL**  
**AFFIRMATION TO**  
**ALKISTIS G. MEIMARIS'**  
**AFFIRMATIONS (ECF No's.**  
**80, 82, & 84) IN**  
**OPPOSITION TO**  
**DEFENDANTS' ROYCE,**  
**BLATTE, PRIETO, TBS**  
**SHIPPING SERVICES**  
**GUARDIAN NAVIGATION**  
**MOTIONS TO DISMISS**  
**PLAINTIFFS THIRD**  
**AMENDED COMPLAINT**  
**AND IN OPPOSITION**  
**TO STAY DISCOVERY**  
**(Exhibits 5 & 6)**

I, ALKISTIS G. MEIMARIS, an Attorney duly admitted to practice before  
this Court, hereby affirms under penalty of perjury, the following is true and correct:

1. I am the Attorney of record for the Plaintiffs, Helen Meimaris as  
Legal Representative and Executrix of the Estate of Alkiviades Meimaris and Helen  
Meimaris.

2. I am fully familiar with the facts set forth herein, and make this  
Affirmation in Opposition to Company Defendants, TBS Shipping Services and  
Guardian Navigation, Motion to Dismiss Plaintiffs' Third Amended Complaint and  
motion to stay discovery.

3. Attached as Exhibit 5, hereto is a true and correct copy of the corporate structure and share holdings of TBS Ecuador.

4. Attached as Exhibit 6, hereto is a true and correct copy of the Stock Purchase Agreement of Alkis Meimaris of TBS Commercial Group dated January 2, 1996.

5. Wherefore, in light of all of the evidentiary documentation against the Defendants, it is respectfully requested for the reasons set forth in the accompanying Memorandum of Law, that Company Defendants, TBS Shipping and Guardian Navigation, motion to dismiss Plaintiffs' Third Amended Complaint should be denied and discovery should be compelled.

6. I declare under penalty of perjury, that the foregoing is true and correct.

/s/ Alkistis G. Meimaris  
ALKISTIS G. MEIMARIS

Dated: October 19, 2018

cc: Counsel of record, via ECF